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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Case No. 20-12345 (MG)
)	
THE ROMAN CATHOLIC DIOCESE OF)	Chapter 11
ROCKVILLE CENTRE, NEW YORK,)	
)	
Debtor. ¹)	

**SUPPLEMENT TO THE SIXTH AND SEVENTH INTERIM FEE APPLICATIONS OF
PACHULSKI STANG ZIEHL & JONES LLP**

Pachulski Stang Ziehl & Jones LLP (“PSZJ”), counsel to the Official Committee of Unsecured Creditors (the “Committee”) of the Debtor in the above-captioned case (the “Debtor”), hereby submits this supplement (the “Supplement”) to its Sixth Interim fee application, Docket No. 1443, and its Seventh Interim fee application, Docket No. 1803 (the “Fee Applications”) in accordance with the Court’s request at the April 25, 2023 hearing on the Seventh Interim fee application. In further support of this Supplement, PSZJ respectfully represents as follows:

¹ The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571-9023.

Expert Summary

1. During the compensation period covered in the Fee Applications, June 1, 2022 through January 31, 2023 (the “Interim Compensation Period”), the Committee directed six experts to perform work in anticipation of litigation in accordance with the *Order Authorizing the Retention of Experts*, Docket No. 783 (the “Expert Order”): Lerman Senter PLLC (“Lerman Senter”); Rock Creek Advisors, LLC (“Rock Creek”); Actuarial Value, LLC (“Actuarial Value”); Groom Law Group, Chartered (“Groom”); CBRE, Inc. – Valuation and Advisory Services (“CBRE”); and The Claro Group, LLC, which was acquired by Stout Risius Ross, LLC (“Stout”) (together, the “Committee Experts”).

2. In accordance with the Expert Order, PSZJ paid the Committee Experts for their work during the Interim Compensation Period after reviewing each Committee Expert’s invoice (the “Expert Invoices”). *See* Expert Order, ¶ 3. PSZJ billed payment of the Expert Invoices as expenses in PSZJ’s monthly fee statements and interim fee applications, including the Fee Applications. *See id.*

3. The following summaries are intended to highlight key services rendered by those experts during the Interim Compensation Period and are not meant to be a detailed description of all work performed.

(A) Lerman Senter

4. During the period prior to Lerman Senter’s retention as a special counsel to the Committee, Lerman Senter served as an expert on FCC licenses in anticipation of litigation from February 22 through October 14, 2022. During that period, Lerman Senter provided expert guidance on the valuation of the FCC licenses and the potential sale of those licenses, including working with a consulting engineer to develop maps of the four licenses geographic service areas

in order to advise the Committee regarding the MHz-POP value of the licenses in anticipation of plan litigation.

Fees: \$9,030.00

(B) Rock Creek

5. During the Interim Compensation Period, Rock Creek developed an expert analysis of the value of the Debtor's pension and welfare and benefits plans, including: (1) reviewing tens of thousands of documents produced by the Debtor related to pension and health and welfare benefits plans; (2) analyzing the pension plans to determine the existence and extent of overfunding; (3) working with Actuarial Value and Groom to analyze the pension funds and health and welfare benefits plans; (4) meetings with Committee professionals regarding pension and benefits funds; (5) drafting a memo for the Committee regarding the pension and benefits plans; and (6) providing expert opinions regarding the use of pension excess funds as a source of DIP lending.

Fees: \$580,445.00

(C) Actuarial Value

6. During the Interim Compensation Period, Actuarial Value provided actuarial expertise regarding the Debtor's pension and welfare and benefits plans' assets including: (1) assisting Rock Creek in review of tens of thousands of documents produced by the Debtor related to pension and health and welfare benefits plans; (2) analyzing pension plans to determine existence and extent of overfunding; (3) working with Rock Creek and Groom to analyze pension funds and health and welfare benefits plans; (4) meetings with Committee professionals regarding pension and benefits funds; and (5) editing and adding to a memo for the Committee regarding pension and benefits plans. Actuarial Value's work was not duplicative of Rock Creek's work

because Rock Creek required the expertise of an actuary, which they did not have in-house, to perform its analysis.

Fees: \$136,725.00

(D) Groom

7. During the Interim Compensation Period, Groom provided expertise regarding the legal regulations related to pension and welfare and benefits plans' assets, including evaluating the possible monetization of excess pension funds. This work contributed to the work that Rock Creek and Actuarial Value performed by providing legal guidance, as neither Rock Creek nor Actuarial Value have lawyers in-house and Committee counsel does not have the necessary pension and welfare and benefit plan expertise.

Fees: \$39,061.25

(E) Stout

During the Interim Compensation Period, Stout provided its expertise in valuing claims and insurance allocation modeling in preparation for potential plan litigation and the parish stay preliminary injunction dispute. This work included, without limitation, the following projects: (1) analyzing proofs of claim data points, including mitigating and aggravating factors, discount factors, and duplicate claims; (2) researching and performing statistical analyzes of potentially comparable sex abuse verdicts, and both IRCP and non-IRCP settlements; (3) updating insurance policy modeling assumptions; (4) preparing valuation model discount updates; (5) developing insurance allocation scenarios and settlement costs schedules to allocate to insurance coverage; (6) conferring with other Committee professionals regarding insurance coverage, and allocation trigger/occurrence assumptions; (7) preparing presentations for Committee counsel; and (8) drafting document requests necessary to performing insurance and claims modeling.

Fees: \$444,319.00

(F) CBRE

8. During the Interim Compensation Period, CBRE provided expertise in anticipation of plan and fraudulent transfer litigation regarding the value of the certain real estate, including appraisals of the Debtor's real property, undeveloped cemetery property, and the property of the former seminary; and appraisals of select parishes' real property that could be contributed to the estate under a plan.

Fees: \$373,500.00

Conclusion

9. PSZJ respectfully requests that the Court enter an order, in the form attached hereto as **Exhibit A**, (a) allowing PSZJ reimbursement of actual and necessary costs and expenses PSZJ incurred during the Interim Compensation Period in payment of Committee Expert invoices in the amount of \$586,788.50; (b) authorizing and directing the Debtor to pay PSZJ the unpaid portion of such allowed Expert Invoices; and (c) granting such further relief as is just and proper.

Date: May 5, 2023

PACHULSKI STANG ZIEHL & JONES LLP

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Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)	Case No. 20-12345 (MG)
)	
THE ROMAN CATHOLIC DIOCESE OF)	Chapter 11
ROCKVILLE CENTRE, NEW YORK,)	
)	
Debtor. ¹)	

**ORDER GRANTING
SEVENTH INTERIM APPLICATION FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES BY PACHULSKI STANG ZIEHL & JONES LLP
AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD FROM OCTOBER 1, 2022 THROUGH JANUARY 31, 2023**

Pachulski Stang Ziehl & Jones LLP (“PSZJ”) as counsel to the Official Committee of Unsecured Creditors in the above-captioned case, filed its Seventh Interim Application for Compensation for the Period from October 1, 2022 through January 31, 2023 (the “Seventh Interim Fee Application”), docket no. 1803 and the Supplement to the Committee’s Sixth and Seventh Interim Fee Applications (the “Supplement”). The Court has reviewed the Seventh Interim Fee Application and the Supplement and finds that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) notice of the Seventh Interim Fee Application, and any hearing on the Seventh Interim Fee Application, was adequate under the circumstances; and (c) all persons with standing have been afforded the opportunity to be heard on the Seventh Interim Fee Application. Accordingly, it is hereby

ORDERED that the Seventh Interim Fee Application is GRANTED. PSZJ is hereby awarded, on an interim basis, the allowance of \$586,788.50 for actual and necessary

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expenses incurred in the above-captioned case during the Seventh Interim Compensation Period. The Debtor is hereby authorized and directed to immediately pay PSZJ the unpaid portion of such allowed expenses.

ORDERED that this Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: May __, 2023
New York, New York

THE HONORABLE MARTIN GLENN
UNITED STATES CHIEF BANKRUPTCY JUDGE